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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ANGELINA ATABEKOVA-
MICHAELIDIS, and VARDOUT
MICHAELIDOU; both individually and
as successors in interest to Decedent
MELKON MICHAELIDIS,

Plaintiffs,

v.

CITY OF LOS ANGELES; and
BRYAN MORALES,

Defendants.

Case No. 2:22-cv-05620-MCS-MAA

[Honorable Mark C. Scarsi]

**PLAINTIFFS' NOTICE OF NON-
OPPOSITION TO DEFENDANT'S
MOTION IN LIMINE NO. 1 TO
BIFURCATE TRIAL INTO PHASES:
(1) LIABILITY PHASE,
COMPENSATORY DAMAGES
CALCULATION, AND PUNITIVE
DAMAGES PREDICATE; AND (2)
PUNITIVE DAMAGES
CALCULATION**

PTC & Hearing on Motions in Limine:

Date: October 16, 2023

Time: 2:00 p.m.

Jury Trial

Date: October 31, 2023

Time: 08:30 a.m.

Ctrm: 7C

350 West 1st Street, 7th Floor
Los Angeles, California 90012

PLAINTIFFS' RESPONSE TO DEFENDANT'S MOTION IN LIMINE NO. 1

Defendant Morales has requested that the Court bifurcate the proceedings into two phases: (1) liability phase, compensatory damages calculation, and punitive damages predicate; and (2) punitive damages calculation. The Defendant's rationale for this request is to streamline the trial process by potentially avoiding discussions about Officer Morales's personal financial details unless absolutely necessary.

Having considered Defendant's proposal and Motion, Plaintiffs do not oppose the Defendant's motion to bifurcate the trial as outlined.

Accordingly, Defendant Morales's Motion *in Limine* No. 1 (Doc. 74) should be GRANTED.

Respectfully submitted,

DATED: October 2, 2018

LAW OFFICES OF DALE K. GALIPO

By /s/ Cooper Alison-Mayne

Dale K. Galipo
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Attorneys for Plaintiffs

CERTIFICATE OF COMPLIANCE

The undersigned, counsel of record for Plaintiffs ANGELINA ATABEKOVA-MICHAELIDIS and VARDOUI MICHAELIDOU certifies that this brief contains 362 words, which complies with the word limit of L.R. 11-6.1.

DATED: October 2, 2023

**LAW OFFICES OF DALE K. GALIPO
MARDIROSIAN & MARDIROSIAN, PLC**

By: /s/ Cooper Alison-Mayne

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